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Of Counsel:  
MARSHALL A. MINTZ

June 6, 2022

Hon. Vernon S. Broderick  
United States District Court  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square, Room 415  
New York, NY 10007

**APPLICATION GRANTED**

**SO ORDERED** *Vern Bro*

**VERNON S. BRODERICK**

**U.S.D.J.** 06/07/22

The defendant is reminded he must comply with all of the other terms of his release.

Re: United States v. Franzone  
21 CR 446 (VSB)

Dear Judge Broderick,

We represent Defendant Andrew Franzone ("Franzone") in the above-captioned case. We write to request permission for Mr. Franzone to travel to Florida later this week.

If granted, Pretrial Services will be provided with Mr. Franzone's travel itinerary. Mr. Franzone would travel to Florida on Thursday, June 9, 2022 and return to New York on Friday, June 10, 2022. The trip would allow him to participate with counsel in investigating and interviewing potential witnesses, meet with attorneys concerning proceedings in the United States Bankruptcy Court for the Southern District of Florida, and potentially view the court's file.

We have asked the Government if the U.S. Attorney's Office has any objection to this request, and have been advised that so long as Mr. Franzone complies with the terms of his bail (i.e. has counsel present during any witness interviews), the Government defers to Pretrial Services.

We have conferred with Pretrial Services. Pretrial Services has no objection to this application, just a reminder that Mr. Franzone must comply with the terms of his bond (i.e. if while in Florida, Mr. Franzone locates his passport or any firearms or weapons, they must be surrendered, and counsel has duly reminded Mr. Franzone of same).


To our knowledge, there have been no issues concerning Mr. Franzone's compliance with the terms of his pretrial release.

RUBINSTEIN & COROZZO, LLP

Wherefore, we respectfully request that Mr. Franzone be permitted to travel to Florida from Thursday, June 9, 2022 to Friday, June 10, 2022.

Thank you for your consideration.

Respectfully,



Joseph R. Corozzo, Esq.  
Angela D. Lipsman, Esq.

cc: AUSA Kiersten Fletcher (via ECF)  
Pretrial Services Officer Francesca Piperato (via email)